

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

FREE SPEECH COALITION, INC, et.      §  
al.,    §  
    §  
Plaintiffs,                                §  
    §  
    §  
v.    § Civil Action No. 1:23-cv-00917-DAE  
    §  
ANGELA COLMENERO, in her official    §  
capacity as Interim Attorney General for    §  
the State of Texas,                            §  
    §  
Defendant.                                §

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**DECLARATION OF DR. VANESSA BOUCHÉ**

1. I am over the age of 18 and have personal knowledge of the facts set forth in this Declaration.

2. I received my B.A. from Columbia University, my M.P.Aff. from the University of Texas, LBJ School of Public Affairs, and my Ph.D. in political science from The Ohio State University.

3. I am a Research Fellow at Southern Methodist University's AT&T Center for Visualization where I research leveraging AI and data science to enhance the data collection and analysis capabilities of HumanTraffickingData.org. I am also a Consultant for the U.S. Department of Homeland Security, helping to develop and implement advanced human trafficking curriculum for federal and local law enforcement agencies. I am also a Consultant for Allies against Slavery where I develop and implement a national data platform to drive evidence-based anti-trafficking policies and programs.

4. I have personal knowledge of the academic and scientific research examining the effects of pornography on children and adolescents.

5. I have also created HumanTraffickingData.org, the largest open-access searchable web application of human trafficking in the U.S. and have done extensive academic research on the subject of human trafficking and issues related thereto.

6. I have reviewed H.B. 1811, specifically Section 129B.004 "Sexual Materials Health Warnings."

7. Based on my knowledge and experience, all three Sexual Material Health Warnings are truthful, nonmisleading, and consistent with the published academic and scientific literature examining the effects of pornography on children and adolescents.

8. Scientific studies have indeed shown that "internet pornography addiction fits into the addiction framework and shares similar basic mechanisms with substance addiction." Explaining the phenomenon of internet pornography addiction, one study notes "[o]verlapping features exist between compulsive sexual behavior (CSB) and substance use disorders. Common neurotransmitter systems may contribute to CSB and substance us disorders, and recent neuroimaging studies highlight similarities relating to craving and attentional biases." Evidence supports the description of CSBs as an addiction, and this addictive effect may be amplified by the accelerated novelty and the 'supranormal stimulus' factor of Internet pornography.

9. Research has established that "frequency of pornography exposure is associated with negatively perceived body image and sexual body image; both heterosexual men and women appear to be affected."

10. One study found a significant negative association between reported pornography hours per week and gray matter volume in the right caudate area of the brain—an area of the brain that plays important roles in various functions, including procedural learning, associative learning, and inhibitory control of action. This finding is bolstered by subsequent behavioral studies, one of which concluded that an increased use of internet pornography decreased boys' academic performance over a six-month period.

11. Studies have shown that viewing pornography increases the likelihood a viewer will engage in deviant sexual behavior, especially if that viewer is a young child or adolescent. "Individuals with a younger 'age of onset' for adult pornography use were more likely to engage in deviant pornography (bestiality or child) compared with those with a later 'age of onset.'"

12. Further, one study concluded that men who were arrested for solicitation of prostitution were twice as likely to report having watched pornographic movies over the preceding year than the national sample.

□

**DECLARATION UNDER PENALTY OF PERJURY**

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the above statements are true and based upon my personal knowledge.

/s/ 

Dr. Vanessa Bouché, Subject Matter Expert